

1 BAKER BOTTS L.L.P.  
Jon V. Swenson (SBN 233054)  
2 1001 Page Mill Road  
Building One, Suite 200  
3 Palo Alto, CA 94304-1007  
Telephone: (650) 739-7500  
4 Facsimile: (650) 739-7699  
Email: jon.swenson@bakerbotts.com  
5

6 BAKER BOTTS L.L.P.  
John M. Taladay (*pro hac vice*)  
Joseph Ostoyich (*pro hac vice*)  
7 Erik T. Koons (*pro hac vice*)  
Charles M. Malaise (*pro hac vice*)  
8 1299 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004-2400  
9 Telephone: (202) 639-7700  
Facsimile: (202) 639-7890  
10 Email: john.taladay@bakerbotts.com  
Email: joseph.ostoyich@bakerbotts.com  
11 Email: erik.koons@bakerbotts.com  
Email: charles.malaise@bakerbotts.com  
12

13 *Attorneys for Defendants Koninklijke Philips N.V., and*  
*Philips Electronics North America Corporation*  
14

15 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
16 **SAN FRANCISCO DIVISION**

17 In re: CATHODE RAY TUBE (CRT)  
18 ANTITRUST LITIGATION

Case No. 07-5944 SC  
MDL No. 1917

19 This Document Relates to:

20 ALL ACTIONS  
21  
22  
23  
24

**KONINKLIJKE PHILIPS N.V. AND**  
**PHILIPS ELECTRONICS NORTH**  
**AMERICA CORPORATION'S**  
**SUPPLEMENTAL INITIAL**  
**DISCLOSURES**

Pursuant to Federal Rules of Civil Procedure 26(a)(1) and 26(e)(1), Defendants Koninklijke Philips N.V. (“KPNV”) and Philips Electronics North America Corporation (“PENAC”) (collectively the “Philips Defendants”) hereby supplement their initial disclosures.

This supplement of the Philips Defendants’ Initial Disclosures are made without prejudice to the Philips Defendants’ right to amend, revise, or supplement their disclosures further at a later date. By making this supplement, the Philips Defendants do not represent that it is identifying every witness that may have discoverable information to the issues in this lawsuit, or on which the Philips Defendants may rely on in support of its defenses.

Further, this supplement is subject to all appropriate objections that would require the exclusion of any information contained herein if introduced as evidence at court. All such objections are reserved and may be interposed at the time of trial. No admissions of any nature are implied or should be inferred.

The Philips Defendants reserves any applicable privileges that may apply to this disclosure and any further supplemental disclosures or other pre-trial discovery, including attorney-client, work product, and any other applicable privilege.

The Philips Defendants reserve the right to continue their investigation and discovery of facts, witnesses, and documents that may reveal additional information about the issues in this matter. Defendants reserve the right at the time of trial to produce, refer to, and offer into evidence any additional documents, facts, and evidence from any sources and testimony from any witness which may be ascertained through its continuing discovery and trial preparation, notwithstanding the reference to information in this supplement.

## **SUPPLEMENTAL INITIAL DISCLOSURES**

### **I. Persons With Knowledge of Discoverable Information (Rule 26(a)(1)(A)(i))**

Set forth below are the names of individuals likely to have discoverable information that the Philips Defendants may use to support their defenses. The Philips Defendants reserve the right to identify additional witnesses as discovery progresses. The Philips Defendants believe that these

1 individuals will likely have information concerning the subjects identified below as well as other  
 2 issues that may be developed during discovery.

- 3 • Frans Johannes Spaargaren
- 4 • Jim Smith
- 5 • Jan de Lombaerde
- 6 • Patrick Canavan

7 Mr. Spaargaren is likely to possess knowledge and information concerning the corporate  
 8 structure of the Cathode Ray Tube (“CRT”) business from 1995 through June 2001, the divestiture  
 9 of the CRT business to the independent joint venture LG.Philips Displays (“LPD”) in July 2001.

10 Mr. Smith is likely to possess knowledge and information concerning the market for, and sale of,  
 11 CRTs. Mr. de Lombaerde is likely to possess knowledge and information concerning Philips  
 12 Consumer Electronics’ purchase and use of cathode ray tubes in televisions and computer monitors.

13 Mr. Canavan is likely to possess knowledge and information concerning the market for, and sale of  
 14 CRTs by PENAC from 1995 through June 2001 and by LPD from June 2001 through 2006.

15  
 16 DATED: September 26, 2013

**BAKER BOTTS L.L.P.**

17  
 18  
 19 By: /s/Jon V. Swenson

20 Jon V. Swenson (SBN 233054)  
 21 1001 Page Mill Road  
 22 Building One, Suite 200  
 23 Palo Alto, CA 94304-1007  
 Telephone: (650) 739-7500  
 Facsimile: (650) 739-7699  
 Email: jon.swenson@bakerbotts.com

24 John M. Taladay (*pro hac vice*)  
 25 Joseph Ostoyich (*pro hac vice*)  
 26 Erik T. Koons (*pro hac vice*)  
 Charles M. Malaise (*pro hac vice*)  
 1299 Pennsylvania Avenue, N.W.  
 Washington, D.C. 20004-2400  
 Telephone: (202) 639-7700  
 Facsimile: (202) 639-7890  
 Email: john.taladay@bakerbotts.com

MDL 1917

Email: joseph.ostoyich@bakerbotts.com  
Email: erik.koons@bakerbotts.com  
Email: charles.malaise@bakerbotts.com

*Attorneys for Defendants Koninklijke Philips N.V.,  
and Philips Electronics North America Corporation*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28